

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

IULIIA POTAPOVA,

Plaintiff,

-against- Case No.

1:23-cv-00571

TOYOTA MOTOR CREDIT CORPORATION,

Defendant.

-----x

DATE: November 7, 2023

TIME: 2:02 p.m.

Deposition of the Plaintiff, IULIIA
POTAPOVA, taken by the Respective parties, held
via videoconference by all participants, before
MICHAEL WILLIAMS, a Notary Public of the State of
New York and Registered Professional Court
Reporter.

HUDSON COURT REPORTING & VIDEO (212) 273-9911

New York
212-273-9911

Hudson Court Reporting & Video
1-800-310-1769

New Jersey
732-906-2078

1 stress, yes.

2 Q. And have you seen any doctors about
3 your headaches or your migraines?

4 A. No, I didn't.

5 Q. Are you on any medication regarding
6 any of your physical symptoms?

7 A. No, I'm not.

8 Q. Have you spoken to anyone about your
9 emotional symptoms?

10 A. What do you mean, the doctors or
11 just --

12 Q. Anyone.

13 A. Yeah, my fiance, now my husband.

14 Q. Anyone else?

15 A. My lawyer.

16 Q. Have you spoken to anyone about your
17 physical symptoms?

18 A. Yes, same people.

19 Q. And that will be your fiance, now
20 husband and your lawyer?

21 A. Yes.

22 Q. Are you claiming any other damages?

23 MR. PIERRE: Objection to form. You
24 can answer.

25 A. Yes, I wanted to get the car in

1 2020. My application was denied as a result my
2 fiance had to get it under his name, which caused
3 an absolute inconvenience situation for me
4 because I was the one who had to drive it.

5 It has impacted his credit
6 obviously. Then in 2022 we were about to buy a
7 house. Our application was denied because of
8 that.

9 As a result we could have had at
10 least 80,000 in equity right now, but we're still
11 living in rental apartment because it is still on
12 my record.

13 I cannot apply for a mortgage right
14 now because with the current interest rates and
15 real estate market. It's impossible to buy
16 anything. My credit card interest instead of
17 being like 18, 19 percent is now 29 percent.

18 So, yeah, there were a lot of other
19 damages. That's what I can recall right now.

20 Q. Okay.

21 MS. STOKES: I'm going to mark
22 Exhibit 15.

23 (Defendant's Exhibit 15 marked for
24 identification.)

25 Q. Do you see exhibit 15?

1 A. Yes.

2 Q. And at the top it says Mortgage
3 Access Corp.

4 So what is this document?

5 A. This is a document I received when I
6 was about, about to buy house. I was applying
7 for a mortgage.

8 Q. Is it a denial?

9 A. I'm not sure. I don't believe it's
10 a denial.

11 Q. It looks like it's just explaining
12 your credit score and information that goes into
13 calculating your score?

14 A. Correct.

15 Q. Is that pretty accurate? Okay. And
16 it's dated September 20, 2022?

17 A. Correct.

18 Q. I want to go down to page -- see
19 there is four pages. I want to go down to page
20 3.

21 So on page 3 it talks about how your
22 score compares to the scores of other consumers.

23 Do you see that on the left-hand
24 side?

25 A. Yes.

1 A. Okay.

2 Q. And just from my review of just with
3 this Experian, that was four accounts that were
4 coming up as potentially negative.

5 Do you see that? Did you count four
6 like I did?

7 MR. PIERRE: Objection to form. you
8 can answer, if you can.

9 A. I saw four accounts potentially
10 negative, yes.

11 Q. Thank you.

12 MS. STOKES: I am about to wrap up.
13 I'm going to take a ten-minute break. I am
14 just going to take a look at my notes and
15 see if there is anything else I want to
16 ask. I'm going to go off the record.

17 Can we go off the record and come
18 back at 5:10.

19 MR. PIERRE: Yes. And I'm going to
20 anticipate some follow-up on my end as
21 well.

22 MS. STOKES: Sure.

23 (A break from the record was taken.)

24 Q. So Miss Potapova, where did you
25 receive the mail for your bar business?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I, MICHAEL WILLIAMS, a Registered Professional Reporter and Notary Public of the State of New York, do hereby certify that prior to the commencement of the examination, the witness was duly sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a true and accurate transcript of the testimony as taken stenographically by and before me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.

MICHAEL WILLIAMS, RPR